

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 05-10218-RCL
)	
JESSE WILSON)	
)	
)	

MOTION TO CONTINUE TIME FOR RESPONDING TO
DEFENDANT'S MOTION TO CORRECT SENTENCE

The government hereby moves to continue for two weeks - until September 10, 2008 - the time by which it must respond to defendant Wilson's motion to correct sentence. As grounds therefor, the government states the following:

Wilson was sentenced on November 5, 2007 and did not file a notice of appeal. On August 13, 2008, he filed a pro se Motion to Correct the Sentence to be Served. The Local Rules require the government to respond within 14 days, which would be no later than August 27, 2008. However, the attorney for the government will be on previously-scheduled annual leave from August 15 until August 25. The government requests this continuance to ensure sufficient time to adequately respond to Wilson's motion.

For all the above reasons, the government respectfully requests that the Court continue the time by which it must file a response to September 10, 2008.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Mark J. Balthazard
MARK J. BALTHAZARD
Assistant U.S. Attorney

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and a paper copy will be mailed on August 14, 2008 to the defendant filing pro se, Jesse Wilson, Reg. No. 25790-038, FCI Cumberland, P.O. Box 1000, Cumberland, MD 21501-1000.

/s/ Mark J. Balthazard
MARK J. BALTHAZARD
Assistant U.S. Attorney